

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

IN RE ENVISION HEALTHCARE CORP.

This Document Relates To: ALL ACTIONS

Case No. 18-cv-01068-RGA

CLASS ACTION

CONSOLIDATED SHAREHOLDER
LITIGATION

**DEFENDANTS' MOTION TO DISMISS THE AMENDED CLASS ACTION
COMPLAINT FOR VIOLATIONS OF
SECTIONS 14(a) AND 20(a) OF THE SECURITIES EXCHANGE ACT OF 1934**

Defendants Envision Healthcare Corp. (“Envision” or the “Company”), William A. Sanger, Christopher A. Holden, James D. Shelton, Michael L. Smith, Leonard M. Riggs, Carol J. Burt, Cynthia S. Miller, Kevin P. Lavender, Joey A. Jacobs, Steven I. Geringer, John T. Gawaluck, and James A. Deal (collectively, the “Defendants”), by and through their undersigned counsel, hereby move to dismiss Plaintiff’s Amended Class Action Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(b) because Plaintiff fails to state a claim upon which relief may be granted. The grounds in support of this motion are set forth more fully in Defendants’ Opening Brief in Support of Defendants’ Motion to Dismiss the Amended Class Action Complaint for Violations of Sections 14(a) and 20(a) of the Securities Exchange Act of 1934, filed contemporaneously herewith.

Respectfully submitted,

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Dated: February 11, 2019